

September 30, 2022

Sent via email: sbcc@des.wa.gov

RE: 2021 Building Codes, Group 2

Dear Washington State Building Code Councilors,

I am writing today on behalf of Zaxium, a commercial property owner and developer, to voice concerns over the Group 2 code package currently up for consideration. I urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package. Further, I would urge adoption of Option 1 of the R406 Table (073) that preserves the ability to choose natural gas for space and water heating.

In its current form, the 2021 code package represents the most stringent code in the nation and will increase the up-front cost of a new home by a minimum of \$24,070, meaning a homeowner will pay \$72,210 for these unfunded mandates over the life of their mortgage.

Of grave concern, is the Residential Energy Code. Washington is one of only three states in the nation operating under the 2018 IECC. 80% of the country is operating on the 2012 code or earlier. While the top ten greenhouse gas emitting states contribute half of the country's total emissions, Washington ranks among the lowest emitting states already. Please preserve energy choice by adopting Option 1 of the R406 Table (073) that allows for natural gas space and water heating capabilities.

In addition to the updated building code, builders are fighting skyrocketing costs for building materials, supply chain challenges (such as with compliant heat pumps, reference emergency rule adopted by the SBCC in July of 2022: CR-103E), rising interest rates, and a shortage of qualified workers.

The HVAC industry specifically is facing changing refrigerant standards, moving from HFC refrigerants to A2L refrigerants. HVAC professionals will need to undergo additional training in installation, maintenance, and repairing systems with the A2L refrigerants. We anticipate this will increase the cost of "traditional" air source heat pumps listed in our initial projections. Further, due to Washington's Electrical Code and Licensing requirements, HVAC Specialty Electricians are barred from connecting the indoor and outdoor components of ductless mini-split systems. Rather, a journey-level electrician must be called to complete this service, resulting in project delays and increased costs to homeowners.

In conclusion, Washington builders and homeowners simply cannot afford for the SBCC to pass this code package.

Thank you for the opportunity to provide input on the Group 2 building codes.

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